## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

TALECRIS BIOTHERAPEUTICS, INC., and BAYER HEALTHCARE LLC,	) )
Plaintiffs,	) )
v.	) C.A. No. 05-349-GMS
BAXTER INTERNATIONAL INC., and BAXTER HEALTHCARE CORPORATION,	) ) <u>Jury Trial Demanded</u> )
Defendants.	, ) )
BAXTER HEALTHCARE CORPORATION,	) )
Counterclaimant,	
ν.	, )
TALECRIS BIOTHERAPEUTICS, INC., and BAYER HEALTHCARE LLC,	) ) )
Counterdefendants.	) )

## PLAINTIFFS' RENOTICE OF DEPOSITION OF SHU-LEN LIU

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that beginning on August 23, 2006 at 9:30 a.m., at the Hyatt Westlake Plaza in Thousand Oaks, 880 S. Westlake Blvd., Westlake Village, California 91361, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take, pursuant to Federal Rules of Civil Procedure 28 and 30, the deposition upon oral examination of Shu-Len Liu.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and crossexamine.

Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

Date: July 28, 2006

CONNOLLY BOVE LODGE & HUTZ LLP

Jeffred B. Bove (#998) Mary W. Bourke (#2356) Mark E. Freeman (#4257) Jaclyn M. Mason (#4737) The Nemours Building 1007 North Orange Street

Wilmington, DE 19801

(302) 658-9141

Attorneys for Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC

Bradford J. Badke Gabrielle Ciuffreda ROPES & GRAY LLP 1251 Avenue of the Americas New York, NY 10020-1105 (212) 596-9000

Attorneys for Bayer Healthcare LLC

## **CERTIFICATE OF SERVICE**

I, hereby certify on this 1st day of August, 2006 I electronically filed the foregoing Notice of Service with the Clerk of Court using CM/ECF which will send notification of such filing to the following:

Philip A. Rovner, Esquire	Susan Spaeth, Esquire
Potter Anderson & Corroon LLP	Townsend and Townsend and Crew LLP
Hercules Plaza	379 Lytton Avenue
P. O. Box 951	Palo Alto, CA 94301-1431
Wilmington, DE 19899	(415) 576-0200
(302) 984-6140	smspaeth@townsend.com
provner@potteranderson.com	

I, also hereby certify that a true copy of the foregoing document was served upon the following in the manner indicated on July 28, 2006.

Via Hand Delivery and E-Mail	Via Federal Express and E-Mail
Philip A. Rovner, Esquire	Susan Spaeth, Esquire
Potter Anderson & Corroon LLP	Townsend and Townsend and Crew LLP
Hercules Plaza	379 Lytton Avenue
P. O. Box 951	Palo Alto, CA 94301-1431
Wilmington, DE 19899	(415) 576-0200
(302) 984-6140	smspaeth@townsend.com
provner@potteranderson.com	

/s/ Jeffrey B. Bove

Jeffrey B. Bove (#998) Mary W. Bourke (#2356) Mark E. Freeman (#4257) Jaclyn M. Mason (#4737) CONNOLLY BOVE LODGE & HUTZ LLP The Nemours Building 1007 North Orange Street Wilmington, DE 19801 Telephone: (302) 658-9141 ibove@cblh.com

Bradford J. Badke Gabrielle Ciuffreda ROPES & GRAY LLP 1251 Avenue of the Americas New York, NY 10020-1105 (212) 596-9000 Attorneys for Bayer Healthcare LLC

Attorneys for Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC